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September 20, 1994

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SEP 20 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket 92-237; Administration of the North
American Numbering Plan

Dear Mr. Caton:

Today, Ronald Havens, Douglas Schoenberger, Woody Traylor and I, representing the Interexchange Carriers Industry Committee (ICIC) met with Kathleen Wallman, Richard Metzger and Peyton Wynns of the Common Carrier Bureau. The purpose of the meeting was to review ICIC's mission, activities and positions on several of the issues in this proceeding. The attached document was used during the meeting.

This notice is being filed in conformance with Section 1.1206 (a) (1) of the Commission's Rules.

Sincerely,



Peter P. Guggina
Chairman
Interexchange Carriers Industry Committee
2400 N. Glenville Drive
Richardson, Texas 75082

Attachment

cc: Mr. Metzger
Ms. Wallman
Mr. Wynns

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INTEREXCHANGE CARRIERS INDUSTRY COMMITTEE (ICIC)

NPRM 92-237 EX PARTE

SEPTEMBER 20, 1994

ICIC

ICIC MISSION

- DEVELOP JOINT UNDERSTANDING OF TECHNICAL ISSUES ASSOCIATED WITH EXCHANGE ACCESS SERVICE
- EVALUATE NON-COMPETITIVE TECHNICAL SUBJECTS OF COMMON INTEREST
- DEVELOP AND ADVOCATE IXC CONSENSUS ON TECHNICAL ISSUES

FCC DIRECTION IS REQUIRED FOR

- **STRUCTURE OF THE INDUSTRY PROCESS BUILDING ON FNF CONCEPTS AND AGREEMENTS.**
- **DISPUTE RESOLUTION WHEN THE INDUSTRY DOES NOT ACHIEVE CONSENSUS, e.g., FNF NON-CONSENSUS ISSUES.**
- **FCC SHOULD RE-AFFIRM THAT THE INDUSTRY SHOULD ATTEMPT TO SOLVE PROBLEMS, BUT STIPULATE SAFEGUARDS PREVENTING UNREASONABLE DELAYS.**

OVERSIGHT COMMITTEE

- OPEN TO ALL INTERESTED PARTIES.
- TIME LIMITS FOR ACTIONS ARE ESSENTIAL.

ARBITRATION

- DELAYED OR NO DECISION INHIBITS COMPETITION.
- NEED ALTERNATE DISPUTE RESOLUTION - EITHER FCC OR THIRD PARTY.
- SOME PROBLEMS GET DELAYED OR NEED THIRD PARTY INTERVENTION, e.g., INBOUND INTERNATIONAL, AND NPA ASSIGNMENTS TO ENTITIES.

NANPA

- MUST BE NEUTRAL THIRD PARTY.
- ATIS LETTING CONTRACT PRESENTS ISSUES.

ATIS

- APPROPRIATE TO SPONSOR INDUSTRY FORUM AND COMMITTEE STRUCTURE
- INDUSTRY NUMBERING COMMITTEE NEEDS TO BE REORGANIZED FROM ICCF
- EXPANDED MEMBERSHIP IS A POSITIVE STEP, BUT SUBSTANTIAL LEC MAJORITY STILL EXISTS

OTHER ISSUES

- **A MINIMUM SIX YEAR PERMISSIVE DIALING PERIOD IS NEEDED FOR FG D CIC EXPANSION**
- **1+ INTERSTATE INTRALATA PRESUBSCRIPTION IS NEEDED**
- **CO CODE ADMINISTRATION MUST BE CENTRALIZED AT THE NANPA**

RECOMMENDATION/SUMMARY

- FCC DIRECTION NEEDED FOR INDUSTRY PROCESS STRUCTURE AND DISPUTE RESOLUTION PROCESS
- OVERSIGHT/INDUSTRY COMMITTEE'S ACTIVITIES MUST BE TIME BOUND WITH OPEN PARTICIPATION
- ARBITRATION OR FCC ALTERNATIVE DISPUTE RESOLUTION PROCESS MUST BE AVAILABLE
- NANPA MUST BE A TRULY INDEPENDENT THIRD PARTY WITH FCC OVERSIGHT
- ATIS IS APPROPRIATE TO SPONSOR OVERSIGHT AND INDUSTRY COMMITTEES, BUT NOT TO LET NANPA CONTRACT
- PROPOSAL BUILDS ON EXISTING PROCESS AND INFRA-STRUCTURE AND RELIES ON INDUSTRY SOLVING ITS PROBLEMS WITH FCC INTERVENTION ONLY WHEN UNAVOIDABLE